

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

STACY D. KINGSBORO,)	Case No:
)	
Plaintiff,)	
)	Judge:
v.)	
)	Magistrate Judge:
P.A.M. CARTAGE CARRIERS, LLC, <i>et al.</i>)	
)	
Defendants.)	

NOTICE OF REMOVAL

Now come Defendants, P.A.M. Cartage Carriers, LLC, P.A.M. Transport, Inc., and Robert Burkee, by and through counsel, Reminger Co., L.P.A., and hereby file their Notice of Removal pursuant to 28 U.S.C. § 1441 with the United States District Court for the Northern District of Ohio, Eastern Division. In support of removal, Defendants state as follows:

1. This case was commenced and is now pending in the Common Pleas Court of Cuyahoga County, Ohio, styled *Stacy D. Kingsboro v. P.A.M. Cartage Carriers, LLC, et al.*, Case No. CV-22-959775. A true and accurate copy of the docket in the Cuyahoga County Action is attached hereto as Exhibit “A.”
2. Plaintiff commenced this action by filing a complaint in the Cuyahoga County Court of Common Pleas on February 18, 2022. A true and accurate copy of the complaint is attached hereto as Exhibit “B.”
3. Defendant Robert Burkee was served with a copy of the Complaint on February 24, 2022 by USPS in New York.
4. At the time Plaintiff filed her Complaint, she was a citizen of Ohio, residing in Vermillion, Ohio. *See* Plaintiff’s Complaint.

5. Defendant P.A.M. Cartage Carriers, LLC, is a domestic limited liability company whose sole member, P.A.M. Transport, Inc., is a resident of Arkansas.
6. Defendant P.A.M. Transport, Inc. is a foreign corporation with a headquarters and principal place of business in Arkansas.
7. Defendant Robert Burkee is a citizen of the State of New York.
8. Thus, this controversy is wholly between citizens of different states.
9. The United States District Court, pursuant to the provisions of 28 U.S.C. § 1332, has jurisdiction over this action because there is complete diversity, and, upon information and belief, the matter in controversy exceeds the sum of \$75,000 exclusive of interest and cost.
10. This notice is filed pursuant to 28 U.S.C. § 1441 within the time limits prescribed by 28 U.S.C. § 1446(b).
11. Defendants will give written notice of the filing of this notice to the Cuyahoga County Court of Common Pleas as required by 28 U.S.C. § 1446(d).

WHEREFORE, Defendants provide notice that this action is removed to the United States District Court for the Northern District of Ohio, Eastern Division, pursuant to 28 U.S.C. § 1441 and 1446, and that the Common Pleas Court of Cuyahoga County shall proceed no further unless this case is remanded.

Respectfully submitted,

/s/David R. Hudson

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Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing has been served upon the following parties via e-mail this 22nd day of March 2022:

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/s/David R. Hudson

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